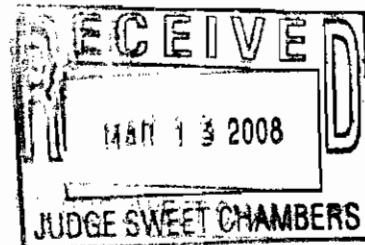


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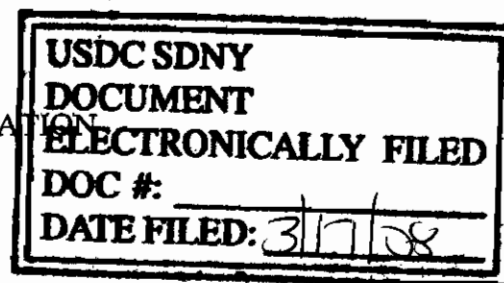


March 13, 2008

TELEFAX: (212)805-7925

Honorable Robert W. Sweet
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

JOINT APPLICATION



Re: Service-Universal Distributors, Inc., et al.
v. M/V "SYDNEY EXPRESS", et al.
07 Civ. 3389 (RWS)
Our File: 7C-1490

Dear Judge Sweet:

I represent the plaintiffs in this admiralty action which involves damage to shipments of wine which moved in multimodal transport from Australia to New York. This is a joint application by all parties to respectfully request permission to conduct further discovery up to and including June 26, 2008.

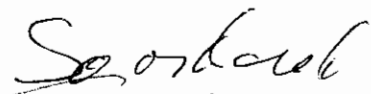
Despite good faith efforts by counsel, it has not been possible to complete discovery in the time period initially anticipated. Certain difficulties have been encountered with respect to documentation from the foreign port involved. Counsel are continuing efforts to narrow the factual issues in dispute. With this in mind counsel respectfully request that the March 26, 2008 discovery deadline be extended to June 26, 2008 with a parallel extension of the pre-trial order deadline to July 16, 2008. The Court's attention is appreciated.

Respectfully,


David L. Mazaroli
dln@mazarolilaw.com

DLM/jcf

cc: Cichanowicz, Callan, Keane, Vengrow & Textor, LLP
Attn.: Patrick Michael DeCharles, II, Esq. (Via e-mail: mdecharles@cckvt.com)


3-13-08